

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION – BAY CITY**

IN THE MATTER OF:

**INSPIRED CONCEPTS, LLC,**

**Case No. 20-20034**

**Chapter 11**

**Debtor.**

**Hon. Daniel Opperman**

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**STIPULATION TO ENTRY OF A PROTECTIVE ORDER  
FOR DOCUMENTS PRODUCED BY DEBTOR TO FIFTH THIRD BANK**

Debtor and Fifth Third Bank, National Association, through counsel, consent and stipulate to entry of the Order attached as Exhibit A.

<b>ROBISON CURPHEY &amp; O'CONNELL</b>	<b>WERNETTE HEILMAN PLLC</b>
By: <u>/s/ W. David Arnold</u> W. David Arnold Attorney for Fifth Third Bank, N.A. 433 N. Summit St. Four SeaGate, Ninth Floor Toledo, OH 43604 Telephone: (419) 249-7900 <a href="mailto:darnold@rcolaw.com">darnold@rcolaw.com</a>	By: <u>/s/ Ryan D. Heilman</u> Ryan D. Heilman (P63952) Attorney for Debtor 40900 Woodward Ave., Ste. 111 Bloomfield Hills, MI 48304 Telephone: (248) 835-4745 <a href="mailto:ryan@wernetteheilman.com">ryan@wernetteheilman.com</a>

**Exhibit A – Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
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**PROTECTIVE ORDER FOR DOCUMENTS PRODUCED  
BY DEBTOR TO FIFTH THIRD BANK**

The Court having reviewed the Stipulation for Entry of a Protective Order (“Stipulation”) to protect documents produced by the Debtor to Fifth Third Bank, National Association (“Fifth Third Bank”); the Debtor having agreed to produce documents to the Official Committee of Unsecured Creditors (“Committee”) through the Second Cash Collateral Order (the “Produced Documents”); Fifth Third having requested access to the Produced Documents; and the Court being fully advised in the premises;

IT IS HEREBY ORDERED that

1) Fifth Third Bank’s access to the Produced Documents shall be subject to the terms of this Protective Order.

2) All Produced Documents that are marked as Confidential or Restricted (“Confidential Documents”) shall be held by Fifth Third Bank in strict confidence, shall only be used in connection with this Bankruptcy Case, and shall only be shared

and discussed among Designated Persons, defined as (i) employees and officers of Fifth Third Bank, (ii) professionals retained by Fifth Third Bank (including attorneys, accountants, appraisers, financial experts, and related advisors), and (iii) officials with, or advisors retained by, the Small Business Administration or other governmental or regulatory agencies who require information relating to Debtor's loans. Fifth Third shall not otherwise provide copies of or information from the Confidential Documents to any other person or entity. Fifth Third Bank shall ensure that each Designated Person who receives Confidential Documents, or summaries, reports or information making use of the Confidential Documents, abides by the restrictions of this Protective Order.

3) "Confidential Documents" do not include any documents that are in the public domain or that Fifth Third Bank has acquired other than from the Produced Documents.

4) This Court retains jurisdiction with respect to all matters arising from or related to the interpretation and implementation of this Order.